

4. On November 24, 2014, Goldberg filed and served a First Amended Class Action Complaint and Jury Demand (“Amended Complaint”).

5. A true and correct copy of all the pleadings filed and served to date are attached hereto as Exhibit A and constitute all processes, pleadings and orders served upon Defendants in this action. See 28 U.S.C. § 1446(a).

6. This Court has original jurisdiction under 28 U.S.C. § 1331 (federal question) because Plaintiff’s Amended Complaint refers to and arises out of alleged violations of a federal statute, the Fair Credit Reporting Act (“FCRA”), 15 U.S.C. §§ 1681 *et seq.* Specifically, the Amended Complaint asserts a claim under Section 1681b(b)(3)(A) of the FCRA. See Amended Compl. ¶¶ 4, 64, 73-79.

7. Pursuant to 28 U.S.C. §§ 1367(a), this Court has supplemental jurisdiction over Plaintiff’s other claims for relief under various Massachusetts statutes because they are so related to the FCRA claims that they form part of the same case or controversy under Article III of the United States Constitution. See Amended Compl. ¶¶ 5-6 (asserting that state laws contain “similar strictures” to the FCRA). Specifically, Plaintiff alleges that, in addition to violating the FCRA, the manner in which Defendants conducted background checks violated the Massachusetts Consumer Credit Reporting Act, M.G.L. c. 93 §§ 50 *et seq.* and the Massachusetts Criminal Offender Record Information law, M.G.L. c. 6 §§ 167-178B. Jurisdiction is thus appropriate for both of Plaintiff’s state law claims. See 28 U.S.C. § 1367(a).

8. Attached as Exhibit B is a copy of the Notice of Filing of Notice of Removal, the original of which is being filed with the Suffolk County Superior Court. See 28 U.S.C. § 1446(d).

9. This Notice of Removal is being filed in the District of Massachusetts, the District Court of the United States for the district and division within which the Superior Court Action is pending. See 28 U.S.C. §§ 1441(a) and 1446(a).

WHEREFORE, Defendants respectfully request that this Action be removed and hereinafter proceed in the United States District Court for the District of Massachusetts.

Respectfully submitted,

**UBER TECHNOLOGIES, INC. AND
RASIER LLC**

By their attorneys,

/s/ Carie A. Torrence

Carie A. Torrence (BBO #675237)

LITTLER MENDELSON, P.C.

One International Place

Suite 2700

Boston, MA 02110

Phone 617.378.6035

Fax 617.737.0052

ctorrence@littler.com

December 1, 2014

CERTIFICATE OF SERVICE

I, Carie A. Torrence, hereby certify that on this 1st day of December, 2014, the foregoing Notice of Removal was filed electronically through the ECF system, is available for viewing and downloading from the ECF system, will be sent electronically to counsel of record as registered participants identified on the Notice of Electronic Filing and via first class mail to all non-registered participants identified on the Notice of Electronic Filing as well as plaintiff's counsel of record:

Michael T. Marshall
The Marshall Law Firm
50 Station Landing
Suite 606
Medford, MA 02155

Philip J. Gordon
Kristen M. Hurley
Gordon Law Group, LLP
585 Boylston Street
Boston, MA 02116

/s/ Carie A. Torrence
Carie A. Torrence